

Jury Interrogatory No. 3

Do you find that Eastside Lincoln Mercury proved by a preponderance of the evidence that Ford, Mr. Carter or Mr. Walls intended to induce Eastside Lincoln Mercury to rely on the false representation **and/or** fact concealed?

You will answer this Interrogatory separately for Ford, Mr. Carter and Mr. Walls.

As to Ford:

_____ Yes

_____ No

As to Mr. Carter:

_____ Yes

_____ No

As to Mr. Walls:

_____ Yes

_____ No

If your answer to this Interrogatory is “yes” for either Ford, Mr. Carter or Mr. Walls, go to Interrogatory No. 4. If your answer to this Interrogatory is “no,” you are done answering these Interrogatories.

Jury Interrogatory No. 4

Do you find that Eastside Lincoln Mercury proved by a preponderance of the evidence that it was justified in relying on the false representation made by **and/or** fact concealed by Ford, Mr. Carter or Mr. Walls and that Eastside Lincoln Mercury did, in fact, rely on the false representation **and/or** fact concealed?

You will answer this Interrogatory separately for Ford, Mr. Carter and Mr. Walls.

As to Ford:

_____ Yes

_____ No

As to Mr. Carter:

_____ Yes

_____ No

As to Mr. Walls:

_____ Yes

_____ No

If your answer to this Interrogatory is “yes” for either Ford, Mr. Carter or Mr. Walls, go to Interrogatory No. 5. If your answer to this Interrogatory is “no,” you are done answering these Interrogatories.

Jury Interrogatory No. 5

Do you find that Eastside Lincoln Mercury proved by a preponderance of the evidence that it was directly and proximately damaged by the false representation made by **and/or** fact concealed by Ford, Mr. Carter or Mr. Walls?

You will answer this Interrogatory separately for Ford, Mr. Carter and Mr. Walls.

As to Ford:

_____ Yes

_____ No

As to Mr. Carter:

_____ Yes

_____ No

As to Mr. Walls:

_____ Yes

_____ No

If your answer to this Interrogatory is "yes" for either Ford, Mr. Carter or Mr. Walls, go to Interrogatory No. 6. If your answer to this Interrogatory is "no," you are done answering these Interrogatories.

Jury Interrogatory No. 6

How much do you find that Eastside Lincoln Mercury was damaged as a direct and proximate result of Ford, Mr. Carter or Mr. Walls' fraud?

You will answer this Interrogatory separately for Ford, Mr. Carter and Mr. Walls.

As to Ford:

\$ _____

_____	_____
_____	_____
_____	_____
_____	_____
_____	_____

As to Mr. Carter:

\$ _____

_____	_____
_____	_____
_____	_____
_____	_____
_____	_____

As to Mr. Walls:

\$ _____

_____	_____
_____	_____
_____	_____
_____	_____
_____	_____

If your answer to this Interrogatory is zero, you are done answering these Interrogatories.

If your answer to this Interrogatory is greater than zero, go to Interrogatory No. 7.

Jury Interrogatory No. 7

Do you find that Eastside Lincoln Mercury proved by clear and convincing evidence that Ford, Mr. Carter or Mr. Walls' fraud demonstrated malice, aggravated or egregious fraud, oppression, or insult?

You will answer this Interrogatory separately for Ford, Mr. Carter and Mr. Walls.

As to Ford:

_____ Yes

_____ No

As to Mr. Carter:

_____ Yes

_____ No

As to Mr. Walls:

_____ Yes

_____ No

If your answer to this Interrogatory is "yes" for either Ford, Mr. Carter or Mr. Walls, go to Interrogatory No. 8. If your answer to this Interrogatory is "no," you are done answering these Interrogatories.

Jury Interrogatory No. 8

How much should Ford, Mr. Carter or Mr. Walls be liable to Eastside Lincoln Mercury as punitive damages to punish them and to make an example of them in order to discourage others from similar conduct?

You will answer this Interrogatory separately for Ford, Mr. Carter and Mr. Walls.

As to Ford:

\$ _____

_____	_____
_____	_____
_____	_____
_____	_____
_____	_____

As to Mr. Carter:

\$ _____

_____	_____
_____	_____
_____	_____
_____	_____
_____	_____

As to Mr. Walls:

\$ _____

_____	_____
_____	_____
_____	_____
_____	_____
_____	_____

Go to Interrogatory No. 9.

Jury Interrogatory No. 9

Do you find by clear and convincing evidence that Ford, Mr. Carter and/or Mr. Walls is liable for the attorneys' fees of the attorneys employed by the Eastside Lincoln Mercury in this case?

You will answer this Interrogatory separately for Ford, Mr. Carter and Mr. Walls.

As to Ford:

_____ Yes

_____ No

As to Mr. Carter:

_____ Yes

_____ No

As to Mr. Walls:

_____ **Yes**

_____ **No**

You are done answering these Interrogatories.

**FORD DEFENDANTS' PROPOSED JURY INTERROGATORIES
FOR CONSPIRACY**

Jury Interrogatory No. 1

Did you find in favor of Eastside Lincoln Mercury on its fraud claims against either Ford,
Mr. Carter or Mr. Walls?

_____ Yes

_____ No

If your answer to this Interrogatory is "yes," go to Interrogatory No. 2. If your answer to
this Interrogatory is "no," you are done answering these Interrogatories.

Jury Interrogatory No. 2

Do you find that Eastside Lincoln Mercury proved by a preponderance of the evidence that at least two of the defendants agreed to commit a fraud on Eastside Lincoln Mercury?

_____ Yes

_____ No

If your answer to this Interrogatory is "yes," go to Interrogatory No. 2. If your answer to this Interrogatory is "no," you are done answering these Interrogatories.

Jury Interrogatory No. 3

Which defendants do you find participated in the conspiracy to commit a fraud on Eastside Lincoln Mercury? **Note: at least one of the defendants found to be part of the conspiracy must be a defendant found to have committed a fraud on Eastside Lincoln Mercury.**

You will answer this Interrogatory separately for Ford, Mr. Carter, Mr. Walls, Mr. Reichert and Kenwood.

As to Ford:

_____ Yes

_____ No

As to Mr. Carter:

_____ Yes

_____ No

As to Mr. Walls:

_____ Yes

_____ No

As to Mr. Reichert:

_____ Yes

_____ No

As to Kenwood:

_____ Yes

_____ No

You are done answering these Interrogatories.